

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>3:18-CR-00097</b>
	:	
<b>v.</b>	:	<b>(Judge Mariani)</b>
	:	
<b>ROSS ROGGIO</b>	:	<b>(Electronically Filed)</b>

**MOTION TO EXTEND THE TIME  
TO FILE PRETRIAL MOTIONS**

AND NOW comes the Defendant, Ross Roggio, by his attorney, Leo A. Latella, Assistant Federal Public Defender, and respectfully moves this Honorable Court to extend the time for filing pretrial motions and briefs. In support thereof, it is averred as follows:

1. On March 20, 2018, Ross Roggio was charged in an indictment with conspiracy to commit an offense against the United States, in violation of 18 U.S.C. § 371; violations of the Arms Export Control Act, 22 U.S.C. § 2778(b) and (c); and the International Emergency Powers Act, 50 U.S.C. §§ 1702 and 1705(c); smuggling goods from the United States, in violation of 18 U.S.C. §§ 554 and 2; wire fraud, in violation of 18 U.S.C. § 1343; and money laundering, in violation of 18 U.S.C. §§ 1956(a)(2)(A) and 2.

2. On March 23, 2018, Mr. Roggio appeared before Magistrate Judge Karoline Mehalchick for an initial appearance and arraignment, and entered a plea

of not guilty to the charges. The Federal Public Defender was appointed to represent Mr. Roggio, and the case was assigned to Assistant Federal Public Defender Melinda C. Ghilardi.

3. Upon motion of Mr. Roggio, this Honorable Court extended the deadline to file pretrial motions until December 31, 2018, and indicated that no further requests for extension will be granted.

4. Because of the extensive amount of discovery, which includes, among other things, 10,000 emails and several thousand pages of other data, and the complexity of this international matter, Mr. Roggio filed a Motion to Designate Complex Case and that motion was granted on October 12, 2018.

5. Assistant Federal Public Defender Melinda C. Ghilardi subsequently announced her retirement and as a result, the case was reassigned to undersigned counsel.

6. Counsel has not had an opportunity to meet with Mr. Roggio or to begin to review the voluminous discovery.

7. Counsel is scheduled to meet with Assistant United States Attorney Todd K. Hinkley to discuss this matter on Monday, December 10, 2018.

8. In order to allow counsel adequate time to review discovery, meet with Mr. Roggio and prepare pretrial motions it is respectfully requested that the pretrial motions deadline be extended for a period of sixty (60) days.

9. The defense avers that the ends of justice served by the granting of the continuance outweigh the best interest of the public and the defendant in a speedy trial.

10. Failure to grant a continuance in this case would deny the Defendant reasonable time necessary for effective preparation.

11. Mr. Roggio asks the Court to set the new pretrial motions deadline as February 28, 2019.

WHEREFORE, the Defendant, Ross Roggio, respectfully requests that this Honorable Court extend the pretrial motions deadline to February 28, 2019.

Respectfully submitted,

Date: December 10, 2018

s/Leo A. Latella

**Leo A. Latella**  
**Assistant Federal Public Defender**  
**Attorney ID# PA 68942**

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**CERTIFICATE OF SERVICE**

I, Leo A. Latella, Assistant Federal Public Defender, do hereby certify that this document, the foregoing **Motion to Extend the Time to File Pretrial Motions**, filed electronically through the ECF system will be sent to the registered Participants as identified on the Notice of Electronic Filing, including the following:

Todd K. Hinkley, Esquire  
Assistant United States Attorney

and by placing the same in the United States mail, first class, postage prepaid, at Scranton, Pennsylvania, addressed to the following:

Mr. Ross Roggio

Date: December 10, 2018

*s/Leo A. Latella*

**Leo A. Latella**

**Assistant Federal Public Defender**